

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

ROYAL MILE COMPANY, INC., ROYAL
MILE ASSET MANAGEMENT, LLC and
PAMELA LANG,

on their own behalf and on behalf of all other
similarly situated,

Plaintiffs,

v.

UPMC and HIGHMARK, INC.,

Defendants.

Civil Action No. 2:10-cv-01609-JFC

ELECTRONICALLY FILED

**DEFENDANT UPMC'S MOTION FOR
ADMISSION *PRO HAC VICE* OF KATHRYN M. FENTON**

Defendant UPMC, through the undersigned attorney, Rebekah B. Kcehowski, a member of the bar of the United States District Court for the Western District of Pennsylvania, hereby moves that Kathryn M. Fenton be admitted and practice in this Court as counsel *pro hac vice* for UPMC. In support of this motion, Attorney Kcehowski certifies the following:

1. Ms. Fenton is a partner in the law firm of Jones Day practicing in Washington, D.C. She is a member in good standing with the District of Columbia Bar and has been since 1978.

2. Ms. Fenton is admitted to practice in federal courts throughout the country, including the United States Courts of Appeals for the Ninth, Tenth, and D.C. Circuits; and the United States District Court for the District of Columbia.

3. Ms. Fenton has never been the subject of any disciplinary action or complaint concerning her practice of law and is a member in good standing in each bar identified above.

4. Ms. Fenton has received, reviewed, and understands the Federal Rules of Civil Procedure and the Local Rules of Court for the Western District of Pennsylvania, and is a registered ECF user in this Court.

5. The undersigned mover is also a registered ECF user in this Court and has read, knows, and understands the Local Rules of Court for the Western District of Pennsylvania.

6. The declaration of Kathryn M. Fenton in support of this motion is attached as Exhibit A.

7. The *pro hac vice* filing fee has been paid.

WHEREFORE, UPMC requests that this Court enter an Order admitting Ms. Fenton *pro hac vice* to appear before the Court in connection with this case. A proposed order for admission is attached.

Dated: July 2, 2012

Respectfully submitted,

/s/ Rebekah B. Kcehowski
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One of the Attorneys for Defendant UPMC